

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

UNITED STATES OF AMERICA

6:22-CR- 00412-MC

v.

INDICTMENT

**ANDRE LAVELL JOHNSON, and
TIFFANY LYNN BELL,**

**21 U.S.C. § 841(a)(1), (b)(1)(A)(vi)
21 U.S.C. § 841(a)(1), (b)(1)(B)(vi)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 2**

Defendants.

Forfeiture Allegations

UNDER SEAL

THE GRAND JURY CHARGES:

**COUNT 1
(Possession with Intent to Distribute Fentanyl)
(21 U.S.C. § 841(a)(1), (b)(1)(B)(vi))**

On or about October 19, 2022, in the District of Oregon, defendant **ANDRE LAVELL JOHNSON** did unlawfully and knowingly possess with the intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vi).

COUNT 2
(Felon in Possession of a Firearm)
(18 U.S.C. § 922(g)(1))

On or about October 19, 2022, in the District of Oregon, defendant **ANDRE LAVELL JOHNSON**, knowing that he had been previously convicted of crimes punishable by imprisonment for a term exceeding one year, to include, Felon in Possession of Weapon and Compelling Prostitution, in the Circuit Court of the State of Oregon for Multnomah County, Case Number 110331220, on or about August 16, 2011, did knowingly and unlawfully possess a firearm, that is, a CZ P-10 pistol, which had previously been shipped or transported in interstate or foreign commerce;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT 3
(Possession with Intent to Distribute Fentanyl)
(21 U.S.C. § 841(a)(1), (b)(1)(A)(vi); 18 U.S.C. § 2)

On or about October 20, 2022, in the District of Oregon, defendants **TIFFANY LYNN BELL** and **ANDRE LAVELL JOHNSON**, did unlawfully and knowingly possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(vi) and Title 18, United States Code, Section 2.

FIRST FORFEITURE ALLEGATION

Upon conviction of the offense in Count 1 and 3, defendants **ANDRE LAVELL JOHNSON** and **TIFFANY LYNN BELL** shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or

indirectly, as a result of the aforesaid violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations.

SECOND FORFEITURE ALLEGATION

Upon conviction of the offense in Count 2, defendant **ANDRE LAVELL JOHNSON** shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the firearm involved in that offense.

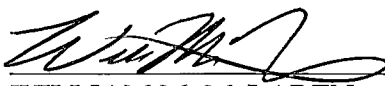
DATED this 17th day of November 2022.

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT
United States Attorney


WILLIAM M. McLAREN
Assistant United States Attorney